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(A complete list of counsel appears in the  
signature block)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ORACLE AMERICA, INC., ORACLE  
INTERNATIONAL CORPORATION, and  
TEXTURA CORPORATION,

Plaintiffs,

v.

PROCORE TECHNOLOGIES, INC.,  
PROCORE PAYMENT SERVICES, INC.,  
AND MARK MARIANO,

Defendants.

Case No. 4:24-cv-07457-JST

**DEFENDANTS PROCORE  
TECHNOLOGIES, INC. AND  
PROCORE PAYMENT SERVICES,  
INC.'S STATEMENT IN RESPONSE  
TO ORACLE'S ADMINISTRATIVE  
MOTION TO CONSIDER SEALING  
PROCORE'S MATERIAL IN THE  
PARTIES' JOINT DISCOVERY  
LETTER REGARDING PROCORE'S  
RESPONSES TO ORACLE'S  
INTERROGATORY NOS. 5, 7, AND 9**

The Hon. Laurel Beeler

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Procore Technologies, Inc. and  
2 Procore Payment Services, Inc. (together, “Procore”) submit this statement in response to Oracle’s  
3 Administrative Motion to Consider Sealing Procore’s Material in the Parties’ Joint Discovery Letter  
4 Regarding Procore’s Responses to Oracle’s Interrogatory Nos. 5, 7, and 9 (Dkt. 195). The subjects  
5 of that motion are excerpts of the Letter Brief, an excerpted Slack conversation produced by Procore  
6 (Exhibit 1), a text message conversation produced by Procore (Exhibit 2), excerpts of certain of  
7 Procore’s Interrogatory responses (Exhibit 3), and a java file produced by Procore (Exhibit 4).

8 Procore designated certain of these documents as “Confidential” or “Highly Confidential –  
9 Attorneys’ Eyes Only” because they contain highly sensitive Procore information. However,  
10 Procore does not contend that the specific excerpts or files included with the Discovery Letter  
11 warrant sealing.

12 By declining to seek sealing of this information, Procore does not waive any rights to require  
13 that Oracle file Procore’s documents designated “Confidential” or “Highly Confidential –  
14 Attorneys’ Eyes Only” under seal in the future, nor does Procore waive any rights to seek sealing  
15 of such documents itself. Procore’s decision not to seek sealing of this information reflects  
16 Procore’s view of the specific information filed, not any other portions of the documents or related  
17 documents.

1 DATED: December 31, 2025

Respectfully submitted,

2 QUINN EMANUEL URQUHART & SULLIVAN,  
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4 By: /s/ David Elihu

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 31st day of December 2025, all counsel of record who are deemed to have consented to electronic services are being served with a copy of this Document via email.

/s/ David Elihu

David Elihu